

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

Second Circuit Cases

	Case Name and Docket	Alleged Conduct	Relevant Charged Violations
1.	<i>United States v. Dhafir</i> , No. 03-cr-64 (N.D.N.Y. 2005)	Defendants accused of conspiring to violate IEEPA by running fraudulent charity designed to illegally send money to religious factions in Iraq and conceal intended recipient of donations.	18 U.S.C. § 371; 18 U.S.C. § 1956
2.	<i>United States v. Hashmi</i> , 06-cr-442 (LAP) (S.D.N.Y. 2006); 2009 WL 4042841 (S.D.N.Y. Nov. 18, 2009)	Defendant accused of conspiracy to violate and substantive violation of the IEEPA for providing al Qaeda with military gear to be used against United States forces in Afghanistan.	50 U.S.C. § 1705(b); 31 C.F.R. §§ 595.204, 595.205
3.	<i>United States v. Gaillard</i> , No. 07-cr-00438 (E.D.N.Y. 2007)	Defendant conspired to violate IEEPA and exported \$300,000 worth of microplate coating and test tube coating systems to Iran via Dubai, UAE.	18 U.S.C. § 371
4.	<i>United States v. Khan</i> , No. 04-cr-441 (E.D.N.Y. 2004)	Defendant conspired to violate IEEPA by exporting aircraft components to Iran.	18 U.S.C. § 371
5.	<i>United States v. Gribbon</i> , No. 07-cr-544 (E.D.N.Y. 2007)	Defendant conspired to violate IEEPA by illegally exporting microplate coating and test tube coating systems to Iran.	18 U.S.C. § 371
6.	<i>United States v. Banki</i> , No. 10-cr-08 (JFK) (S.D.N.Y. 2010); 685 F.3d 99 (2d Cir. 2012)	Defendant convicted of conspiracy to violate IEEPA by operating hawala system, an unlicensed money transmitting business, sending funds to Iran.	18 U.S.C. § 371; 50 U.S.C. § 1705; 18 U.S.C. § 1960
7.	<i>United States v. Safarha</i> , No. 10-cr-625 (RJS) (S.D.N.Y. 2011)	Defendant conspired to violate IEEPA by transmitting approximately \$300,000 through the hawala system to Iran.	18 U.S.C. § 371; 50 U.S.C. § 1701; 18 U.S.C. § 1956
8.	<i>United States v. Fishenko, et al.</i> , No. 12-cr-626 (SJ) (E.D.N.Y. 2012)	Defendants conspired to violate IEEPA by exporting microelectronics to Russian military and intelligence agencies.	18 U.S.C. § 371; 50 U.S.C. § 1705
9.	<i>United States v. Chen</i> , No. 12-cr-563 (NGG) (E.D.N.Y. 2012)	Defendant conspired to violate IEEPA by acquiring and attempting to export a specialized type of carbon fiber used in military or nuclear engineering projects from US to Taiwan.	50 U.S.C. §§ 1702, 1705

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

	Case Name and Docket	Alleged Conduct	Relevant Charged Violations
10.	<i>United States v. Ponomarenko</i> , No. 12-cr-254 (ERK) (E.D.N.Y. 2012)	Defendant attempted to export military-guide night vision rifle scopes from US to Ukraine.	50 U.S.C. § 1705(c)
11.	<i>United States v. Sarvestani</i> , No. 13-cr-214 (PGG) (S.D.N.Y. 2013); 297 F.R.D. 228 (S.D.N.Y. 2014)	Defendant conspired to violate IEEPA by using two UAE companies to conceal the true destination of US-made technology exported to Iran.	18 U.S.C. § 371; 50 U.S.C. § 1705
12.	<i>United States v. Talebi</i> , No. 12-cr-295 (S.D.N.Y. 2013)	Defendant conspired to violate IEEPA by shipping parts from US designed to be used in industrial operations, such as petrochemical plants, to customers in Iran.	18 U.S.C. § 371; 50 U.S.C. § 1702
13.	<i>United States v. Zhang</i> , No. 12-cr-00666 (E.D.N.Y. 2012)	Defendant attempted to export aerospace-grade carbon fiber to China.	50 U.S.C. § 1705
14.	<i>United States v. Bout et al.</i> , No. 09-cr-01002 (S.D.N.Y. 2009)	Defendants conspired to launder money and ship American aircrafts and other military items to Iran, Afghanistan, Congo, Sudan, etc.	50 U.S.C. § 1705; 18 U.S.C. § 1956
15.	<i>United States v. Gromacki</i> , No. 12-cr-00302 (S.D.N.Y. 2012)	Defendant conspired to export high-grade carbon fiber to China.	18 U.S.C. § 371; 15 U.S.C. § 1702
16.	<i>United States v. Parsa</i> , No. 14-cr-00710 (S.D.N.Y. 2014)	Defendant conspired to violate IEEPA by obtaining high-tech electronic components from American companies for shipment to Iran.	50 U.S.C. § 1705
17.	<i>United States v. Kuyumcu</i> , No. 16-cr-00308 (DLI) (E.D.N.Y. 2016); 2017 WL 3995576 (E.D.N.Y. 2017)	Defendant conspired to violate IEEPA by exporting metallic powder used to coat turbines with potential military, aerospace, missile, and nuclear applications to Iran via Istanbul.	50 U.S.C. § 1705
18.	<i>United States v. Zarrab</i> , No. 15-cr-867 (RMB) (S.D.N.Y. 2016)	Defendant conspired to conduct international financial transactions using Turkish and Emirati companies to conceal services provided to Iran and agents of the Islamic Revolutionary Guard Corp.	18 U.S.C. § 371; 50 U.S.C. §§ 1701-1706; 31 C.F.R. §§ 560.202-205

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

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19.	<i>United States v. Diatlova</i> , 2017 WL 1755967 (E.D.N.Y. 2017)	Defendant convicted of conspiring to violate IEEPA and commit wire fraud related to shipping an export-controlled microelectronic to Russia.	50 U.S.C. §§ 1701-1707
20.	<i>United States v. Sun</i> , No. 16-cr-404 (AKH) (S.D.N.Y. 2016)	Defendant attempted to export carbon fiber with military and aerospace applications from US to China.	50 U.S.C. §§ 1702, 1705
21.	<i>United States v. Henry</i> , 13-CR-91 (RRM) (E.D.N.Y. 2013); 888 F.3d 589 (2d Cir. 2018)	Defendant accused of attempting to violate IEEPA by running arms export business and exporting “ablative materials” from US to customer in Taiwan, who was buying the materials on behalf of the Taiwanese military.	18 U.S.C. § 371; 50 U.S.C. 1705
22.	<i>United States v. Mustafa</i> , No. 04-CR-356 (KBF) (E.D.N.Y. 2004); 753 F. App'x 22 (2d Cir. 2018)	Defendant conspired to violate IEEPA by providing material support and resources to the Taliban.	18 U.S.C. § 371; 50 U.S.C. § 1705; 31 C.F.R. §§ 545.204, 545.206(b)
23.	<i>United States v. Sheikzadeh</i> , No. 15-cr-00182 (PKC) (E.D.N.Y. 2015)	Defendant conspired to violate IEEPA by providing hawala services to people in Iran.	50 U.S.C. § 1705
24.	<i>United States v. Nejad</i> , 18-cr-224 (AJN) (SDNY 2018)	Defendant accused of conspiring to conduct international financial transactions using Venezuelan state-owned energy companies to conceal from US that services were for the benefit of Iranian individuals.	18 U.S.C. § 371 (conviction vacated) 50 U.S.C. § 1705; 31 C.F.R. §§ 560.203, 560.204, 560.205 (conviction vacated)
25.	<i>United States v. Atilla</i> , No.15-cr-867 (RMB) (S.D.N.Y. 2015); 966 F.3d 118 (2d Cir. 2020)	Defendant conspiring to violate IEEPA by orchestrating a scheme to launder billions of dollars in Iranian oil proceeds held in “blocked” accounts at a major Turkish bank and lying to Treasury Department.	18 U.S.C. § 371; 50 U.S.C. §§ 1701-1707; 31 C.F.R. Parts 560 and 561; 18 U.S.C. §§ 1956(a)(2)(A), 1956(h)

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

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26.	<i>U.S. v. Olangian</i> , No. 12-CR-00798-LAP (S.D.N.Y. 2012); 803 F. App'x 536 (2d Cir. 2020)	Defendant conspired to violate IEEPA by acquiring and transferring anti-aircraft missiles to Iran.	50 U.S.C. § 1705
27.	<i>United States v. Griffith</i> , 20-cr-15 (PKC) (SDNY 2020)	Defendant accused of conspiring to violate IEEPA by provide services to DPRK by traveling there to present at conference on blockchain technology.	50 U.S.C. § 1705(a); 31 C.F.R. §§ 510.206(a) and 510.212(b)
28.	<i>United States v. Bazzazi</i> , 24-Cr.-60 (E.D.N.Y. Feb. 7, 2024)	Defendants conspired to violate IEEPA by exporting U.S. parts and technology with military applications to Iran.	50 U.S.C. § 1705

Cases from Other Circuits

	Case Name	Alleged Conduct	Relevant Charged Violations
1.	<i>United States v. Al-Arian</i> , 308 F. Supp. 2d 1322 (M.D.F.L. 2004)	Defendants, members of the Palestinian Islamic Jihad–Shiqaqi Faction, conspired to violate IEEPA by operating and directing fundraising and violent criminal activities in support of terrorist organization.	18 U.S.C. § 371; 50 U.S.C. § 1705(b)
2.	<i>United States v. Mahmood</i> , No. 04-cr-00365 (D.D.C. 2004)	Defendants conspired to violate IEEPA by exporting construction equipment and spare parts to Iran.	18 U.S.C. § 371
3.	<i>United States v. Miller</i> , No. 02-cr-01117 (N.D. Ill. 2002)	Defendants conspired to violate IEEPA by attempting to export items designated on the Commerce Control List to China.	50 U.S.C. § 1705(b)
4.	<i>United States v. Quinn</i> , 401 F. Supp. 2d 80 (D.D.C. 2005)	Defendants conspired to violate IEEPA by exporting forklift truck parts from United States to Iran.	50 U.S.C. § 1705(b); 18 U.S.C. § 371

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

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5.	<i>United States v. Anvari-Hamendani</i> , No. 04-cr-786 (N.D. Oh. 2004)	Defendant transferred \$4 million to Iran including by use of a hawala system.	18 U.S.C. § 1705; 18 U.S.C. § 1956
6.	<i>United States v. Elashi</i> , No. 3:02-cr-052 (N.D. Tx. 2006)	Defendants conspired to violate IEEPA by supporting Hamas, laundering money, transacting with entities and persons on the SDN list and dealing in the property of a SDT.	18 U.S.C. § 371; 50 U.S.C. § 1701; 18 U.S.C. § 1956
7.	<i>United States v. Esfahani</i> , No. 05-cr-00255 (N.D. Ill. 2005)	Defendant was accused of running an unlicensed money transmittal business and violating IEEPA by sending funds from US to Iran.	18 U.S.C. § 1960; 50 U.S.C. § 1705
8.	<i>United States v. Montgomery</i> , 441 F. Supp. 2d 58 (D.D.C. 2006)	Defendant convicted of conspiring to violate IEEPA by trafficking arms from the United States to Macedonia and Slovenia.	50 U.S.C. §§ 1701-1706; 18 U.S.C. § 371
9.	<i>United States v. Sevilla</i> , No. 04-cr-00171 (N.D. Ill. 2004)	Defendant attempted to export electronics testing equipment to Iran and evade sanctions.	18 U.S.C. § 1705(b)
10.	<i>United States v. Wen, et al.</i> , No. 04-cr-00241 (E.D. Wis. 2005)	Defendants conspired to violate IEEPA by exporting restricted computer chips to China and concealing ultimate destination of exports.	18 U.S.C. § 371; 18 U.S.C. § 1956
11.	<i>United States v. Freyer</i> , No. 06-cr-00891 (C.D. Cal. 2006)	Defendants conspired to violate IEEPA by exporting petrochemical valves to Iran and Iraq.	50 U.S.C. §§ 1701-1706
12.	<i>United States v. Galgoul</i> , No. 07-cr-00211 (E.D.L.A. 2007)	Defendant conspired to violate IEEPA by selling oilfield industry software and commodities to Iranian companies.	18 U.S.C. § 371
13.	<i>United States v. Ghashim</i> , No. 06-cr-283 (S.D. Tex. 2006)	Defendant attempted to export computer equipment to Syria.	50 U.S.C. § 1701-1706
14.	<i>United States v. Maleki-Gomi</i> , No. 06-cr-00291 (D.D.C. 2008)	Defendants conspired to violate IEEPA and evade sanctions by shipping textile equipment from US to Iran through a front company in Dubai.	18 U.S.C. § 371; 50 U.S.C. § 1705
15.	<i>United States v. Rezaei</i> , No. 07-cr-00380 (N.D. Ga. 2007)	Defendant conspired to violate IEEPA by exporting computers and data processing machines to Iran via Dubai.	18 U.S.C. § 371; 50 U.S.C. § 1702, 1705(b)
16.	<i>United States v. Groos</i> , No. 06-cr-00420 (N.D. Ill. 2006)	Defendant willfully exported fire suppression equipment to Iran knowing the ultimate destination was Iran.	50 U.S.C. §§ 1702, 1705

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

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17.	<i>United States v. Hanna</i> , No. 07-cr-20355 (E.D. Mich. 2007); 2012 WL 2094388 (E.D.Mich. 2012)	Defendants conspired to export mobile telecommunications network to Iraqi government under Saddam Hussein and evade sanctions.	18 U.S.C. § 371; 50 U.S.C. § 1705; 18 U.S.C. § 1956
18.	<i>United States v. Vaghari</i> , 2:08-cr-00693 (E.D. Pa. 2008); 653 F. Supp. 2d 537 (E.D. Pa. 2009)	Defendant conspired to violate IEEPA by transshipping sophisticated goods including computer equipment, fuel cell technology, and electrical equipment through Dubai to Iran.	18 U.S.C. § 371; 50 U.S.C. §§ 1701-05
19.	<i>United States v. Amirnazmi</i> , No. 08-cr-00429 (E.D.P.A. 2008); 648 F.Supp.2d 718 (E.D.P.A. 2009)	Defendant conspired to violate IEEPA by marketing and providing software program and training to Iranian companies.	18 U.S.C. § 371; 50 U.S.C. § 1705
20.	<i>United States v. Avanesian</i> , No. 09-cr-01344 (C.D. Cal. 2009)	Defendant conspired to violate IEEPA by exporting equipment for the enrichment of uranium to Iran.	18 U.S.C. § 371; 50 U.S.C. § 1701; 18 U.S.C. § 1956
21.	<i>United States v. Mirza</i> , No. 4:06-cr-00421 (S.D. Tex. 2006)	Defendants conspired to ship firearms and ammunition and to contribute funds to benefit the Taliban.	18 U.S.C. § 371; 50 U.S.C. § 1705(b)
22.	<i>United States v. Shemami</i> , No. 2:07-cr-20160 (E.D.M.I. 2007)	Defendant conspired to violate IEEPA by supplying Iraq government with sensitive intelligence information.	18 U.S.C. § 371; 50 U.S.C. §§ 1701-1707
23.	<i>United States v. Singh</i> , No. 10-cr-00093 (D. Del. 2010)	Defendant attempted to export digital microwave radios to Iran in violation of IEEPA.	50 U.S.C. § 1702, 1705(a),(c)
24.	<i>U.S.A. v. Alexander</i> , No. 4:11-cr-00036-HLM-WEJ (N.D.Ga. 2011)	Defendants conspired to violate IEEPA by exporting waterjet cutting systems from the US to Iran.	18 U.S.C. § 371; 15 U.S.C. §§ 1701-1705
25.	<i>United States v. Aydin</i> , No. 1:12-cr-00221-ODE-JEM (N.D. Ga. 2012); 2015 WL 927666 (N.D.Ga. 2015)	Defendants conspired to violate IEEPA by exporting from the United States to the Iran defense articles, microcircuits, and other aircraft parts.	18 U.S.C. § 371; 15 U.S.C. §§ 1701-1706
26.	<i>United States v. Kraaiipoel</i> , No. 09-cr-00220 (D.D.C. 2012)	Defendants conspired to violate IEEPA and evade sanctions by supplying aviation components from United States to Iran.	18 U.S.C. § 371

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

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27.	<i>United States v. Boltutskiy</i> , No. 2:11-cr-00553-PD (E.D. Pa. 2011)	Defendant, an international arms dealer from Belarus, conspired to and exported hundreds of sophisticated military technology items from the United States to Belarus. Defendant also arranged for payment of the items through secret wires and offshore shell companies.	18 U.S.C. § 371; 50 U.S.C. § 1705; 18 U.S.C. § 1956
28.	<i>United States v. Modanlo</i> , No. 10-cr-295 (D. Md. 2010)	Defendant conspired to violate IEEPA by providing illegal satellite services to Iran, laundering money, and obstructing bankruptcy proceedings.	18 U.S.C. § 371; 50 U.S.C. § 1705; 18 U.S.C. § 1956; 18 U.S.C. § 1957
29.	<i>United States v. Taherkhani</i> , No. 13-cr-04228 (S.D. Ca. 2013)	Defendants conspired to acquire United States goods technology for illegal export from the United States to Iran.	50 U.S.C. § 1702; 18 U.S.C. § 371
30.	<i>United States v. Zhen Zhou Wu</i> , No. 08-cr-10386-PBS, 2011 WL 31345, at *1 (D. Mass. Jan. 4, 2011); 711 F.3d 1 (1st Cir. 2013)	Defendants shipped tens of millions of dollars worth of sophisticated electronic components from the United States to China.	50 U.S.C. § 1705
31.	<i>U.S. v. Nazemzadeh</i> , 11-cr-5726 (S.D. Ca. 2011); 2014 WL 310460 (S.D.Cal. 2014)	Defendant conspired to violate IEEPA by procuring medical equipment for shipment to Iran in violation of U.S. export laws.	50 U.S.C. §§ 1702, 1705; 18 U.S.C. 371; 18 U.S.C. 1956(a)(2)
32.	<i>United States v. Turner</i> , 13-cr-572 (N.D. Ill. 2013); 840 F.3d 336 (7th Cir. 2016)	Defendant conspired to violate IEEPA by providing public relations, political consulting, and lobbying services “on behalf of or for the benefit of” certain Zimbabwean officials who were SDNs.	50 U.S.C. §§ 1701-1707
33.	<i>United States v. Kim</i> , 103 F. Supp. 3d 32 (D.D.C. 2015)	Defendants conspired to export defense articles through to intermediaries in China and Korea to ultimate customers in Iran.	50 U.S.C. §§ 1701-1707
34.	<i>United States v. Keshavarzi</i> , No. 1:12-cr-00220-ELR-JKL (N.D.Ga. 2012)	Defendants conspired to violate IEEPA by exporting epoxy manufactured in the US to Iran.	18 U.S.C. § 371; 50 U.S.C. §§ 1701-1701

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

	Case Name	Alleged Conduct	Relevant Charged Violations
35.	<i>United States v. al- Baroudi</i> , No. 15-cr-00102 (E.D. Va. 2015)	Defendant conspired to violate IEEPA by exporting an epoxy manufactured in the US to Syria to supply rebel groups and evade sanctions.	50 U.S.C. § 1702, 1705
36.	<i>United States v. Chen</i> , No. 16-cr-11 (D. Del. 2016)	Defendant conspired to violate IEEPA and attempted to cause the export of controlled items including sophisticated night vision and thermal imaging scopes with military applications to China.	18 U.S.C. § 371; 50 U.S.C. § 1702, 1705
37.	<i>United States v. Cheng</i> , No. 13-cr-10332 (D. Mass 2013)	Defendants conspired to violate IEEPA by working with two Iranian companies to supply pressure transducers and nuclear parts to Iran.	50 U.S.C. § 1705; 18 U.S.C. § 371
38.	<i>United States v. Zadeh</i> , No. 10-cr-00309 (D.D.C. 2010)	Defendant conspired to violate IEEPA by exporting US goods, including aviation parts and supplies, to Iran military end-users.	18 U.S.C. § 371; 50 U.S.C. § 1705
39.	<i>United States v. Tajideen</i> , 319 F. Supp. 3d 445 (D.D.C. 2018)	Defendant conspired to violate IEEPA by conducting unlawful transactions and causing US persons to conduct unlawful transactions with specially-designated global terrorist.	18 U.S.C. § 371; 18 U.S.C. § 1956(a)(2)(A); 50 U.S.C. §§ 1701-1707
40.	<i>United States v. Hamed</i> , 4:07-cr-087 (W.D. Mo. 2007)	Defendant conspired to violate IEEPA by causing nonprofit Islamic American Relief Agency to send funds from US to Iraq.	18 U.S.C. § 371; 50 U.S.C. §§ 1701-1707
41.	<i>United States v. Joseph</i> , 9:18-cr-80139 (S.D. Fl. 2018); 806 F. App'x 910 (11th Cir. 2020)	Defendant conspired to export firearms and ammunition to Haiti.	18 U.S.C. § 371; 50 U.S.C. § 1705
42.	<i>United States v. Singer</i> , 4:18-cr-10012 (S.D. Fl. 2018); 963 F.3d 1144 (11th Cir. 2020)	Defendant attempted to export high-speed communications modems to Cuba and made false statement to government officer.	50 U.S.C. § 1705
43.	<i>United States v. Hovan</i> , No. 2:20-cr-254 (E.D.Pa. 2020)	Defendant and co-conspirators conspired to purchase and sell Iranian oil and evade U.S. sanctions against Iran.	18 U.S.C. § 371; 18 U.S.C. § 1956(h); 50 U.S.C. §§ 1701-1707
44.	<i>United States v. Shih</i> , 2:18-cr-050 (C.D. Ca. 2018); 73 F.4th 1077 (9th Cir. 2023)	Defendant conspired to violate IEEPA by exporting semiconductors to China through several intermediaries.	50 U.S.C. §§ 1705(a), (c); 18 U.S.C. § 1956(a)(2)(A)

United States v. Storm, 23-cr-430 (KPF)
DeFi Education Fund Amicus Exhibit A
Table of IEEPA Indictments Against Individual Defendants

	Case Name	Alleged Conduct	Relevant Charged Violations
45.	<i>United States v. Sotis</i> , 1:19-cr-20693 (S.D. Fl. 2019); 89 F.4th 862 (11th Cir. 2023)	Defendant conspired to violate IEEPA by attempting to export diving rebreathers to Libya.	50 U.S.C. §§ 1705(a), (c)
46.	<i>United States v. Fowler</i> , 8-CR-03 (LMA)(JCW) (E.D.L.A. 2008)	Defendant conspired to violate IEEPA by exporting software to Iran customers.	18 U.S.C. § 371
47.	<i>United States v. Larrison</i> , 9-CR-113 (D. Del. 2009)	Defendant knowingly and willfully attempted to export technology including camera and television controls to Iran.	50 U.S.C. § 1702, 1705
48.	<i>United States v. Hassanshahi</i> , 13-CR-274 (RC) (D.D.C. 2013)	Defendants conspired to violate by IEEPA by causing company in Canada to export a protection relay and related parts and accessories to Iran, through Armenia	18 U.S.C. § 371; 50 U.S.C. § 1705
49.	<i>United States v. Habibion</i> , 11-CR-118 (ESH) (D.D.C. 2011)	Defendants conspired with a company operating in UAE and Iran to procure U.S.-origin computers and export those computers to Iran, through Dubai.	18 U.S.C. § 371; 50 U.S.C. § 1705
50.	<i>United States v. Mousavi</i> , 2:07-cr-00513 (C.D. Ca. 2007); 604 F.3d 1084 (9th Cir. 2010)	Defendant entered into written consulting agreement to provide services to Kuwaiti company related to bid for mobile communication license in Iran.	50 U.S.C. §§ 1705; 18 U.S.C. § 1957